

REMARKS

Summary of the Office Action

Claims 1-3, 5-8, 10, 11, 15, and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tan et al. (US 5,991,134) in view of Otomo al. (US 5,784,235).

Summary of the Response to the Office Action

Applicant has amended claims 1 and 5 to further define the invention. Accordingly, claims 1-3, 5-8, 10, 11, 15, and 16 are pending for reconsideration.

Request for Interview

If the next Communication from the Office is not a Notice of Allowance, Applicant respectfully requests an Interview with the Examiner to advance prosecution of the application. Accordingly, the Examiner is requested to contact Applicant's undersigned representative at the telephone number provided below as soon as the Examiner receives this Amendment for further consideration.

All Claims Define Allowable Subject Matter

Claims 1-3, 5-8, 10, 11, 15, and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tan et al. (US 5,991,134) in view of Otomo al. (US 5,784,235). Applicant respectfully traverses the rejection as being based upon a combination of references that neither teaches nor suggests the novel combination of features recited in independent claims 1 and 5, and hence dependent claims 2, 3, 6-8, 10, 11, 15, and 16.

Independent claims 1 and 5, as amended, both recite a semiconductor integrated circuit device including "an inter-circuit signal wire different from said power lines arranged to interconnect said internal circuits," and "an active element in a first connection configuration

connected to said inter-circuit signal wire.” At least these features of amended independent claims 1 and 5 are neither taught nor suggested by Tan et al. and Otomo al., whether taken singly or combined.

In contrast to Applicant’s claimed invention, the Office Action alleges that the line Vdd is the “inter-circuit signal wire,” and that the ESD Protection Device 130 is the “first active element,” recited by independent claims 1 and 5. Applicant respectfully disagrees. In FIG. 3 of Tan et al., power lines Vdd and Vss are connected to the ESD Protection Device 130. Accordingly, Applicant respectfully asserts that Tan et al. fails to teach or suggest a plurality of internal circuits having different power lines, a plurality of external signal input/output circuits connected to said internal circuits, and “an inter-circuit signal wire different from said power lines arranged to interconnect said internal circuits, wherein said inter-circuit signal wire is not directly connected to said external signal input/output circuits.”

In addition, Applicant respectfully submits that if, according to the Examiner, the element 130 in FIG. 3 of Tan et al. is considered to be an active element in a first connection configuration and the element 170 is considered to be another active element in a second connection configuration, then the element 170 does not protect the element 130. Accordingly, Applicant respectfully asserts that Tan et al. fails to teach or suggest other active elements “in a second connection configuration for protecting said active element in the first connection configuration,” as recited by independent claims 1 and 5.

Applicant further asserts that the Office Action does not rely on Otomo et al. to remedy the deficiencies of Tan et al. Moreover, Applicant respectfully asserts that Otomo et al. cannot remedy the deficiencies of Tan et al.

For at least the above reasons, Applicant respectfully submits that independent claims 1 and 5 are neither taught nor suggested by Tan et al. and/or Otomo et al., whether taken alone or in combination. Thus, Applicant respectfully asserts that the rejection under 35 U.S.C. § 103(a) should be withdrawn because the above-discussed novel combination of features are neither taught nor suggested by any of the applied references.

CONCLUSION

In view of the foregoing remarks, Applicant respectfully requests reconsideration and the timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under

37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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